

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC,)	
etc., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.
)	05-03639 JW
GOOGLE, INC.,)	
)	
)	
Defendant.)	
_____)	

30 (b) (6) DEPOSITION OF BRETT R. HANSON

August 18, 2006

228010



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(415) 433.5777 San Francisco	(951) 686.0606 Inland Empire	(760) 322.2240 Palm Springs

1

B. Hanson

10:02

2

proprietorship, have you otherwise placed any

10:02

3

advertisements with Google for yourself?

10:02

4

A. Not that I can recall.

10:04

5

Q. And with respect to Industrial

10:04

6

Printing, when did Industrial Printing first

10:04

7

start to do business with Google?

10:04

8

A. I think it was on or about

10:04

9

July 2002.

10:04

10

Q. And prior to that time, had you

10:04

11

had -- pardon me. Prior to that time, had

10:04

12

you used any other on-line advertising other

10:04

13

than Google?

10:04

14

MR. LEVY: Could you tell me who

10:04

15

"you" is?

10:04

16

MR. BIDERMAN: The sole

10:04

17

proprietorship and Industrial Printing.

10:04

18

MR. LEVY: You're asking did

10:04

19

Industrial Printing use another

10:04

20

service?

10:04

21

MR. BIDERMAN: Yes.

10:04

22

Q. Yahoo, Overture?

10:04

23

A. Could you ask the question

10:04

24

again, please.

10:04

25

Q. Sure. Prior to starting to do

1

B. Hanson

10:05

2

business with Google, had industrial printing

10:05

3

used any other on-line advertising services?

10:05

4

A. Yes, sir.

10:05

5

Q. What were those?

10:05

6

A. The ones I can recall are Yahoo,

10:05

7

which was Overture, Ah-Ha. I think that may

10:05

8

have been the extent of the -- the extent of

10:05

9

them that I can recall.

10:05

10

Q. Okay. And what type of business

10:05

11

is Industrial Printing engaged in?

10:05

12

A. Printing services.

10:05

13

Q. What type of printing services?

10:05

14

A. Printing on three-dimensional

10:05

15

substrates.

10:05

16

Q. And is that the same type of

10:05

17

business that Hanson Industries is engaged

10:06

18

in?

10:06

19

A. I'm not sure of the full extent

10:06

20

of what Hanson Industries does.

10:06

21

Q. Does Hanson Industries do

10:06

22

printing on three-dimensional substrates?

10:06

23

A. I'm not sure if they do at this

10:06

24

point.

10:06

25

Q. And how about CLRB Hanson, does

1

B. Hanson

11:00

2

with a daily budget of \$50 for Industrial

11:00

3

Printing. Has that daily budget changed?

11:00

4

A. I believe you have the records.

11:00

5

Yes.

11:00

6

Q. And how often has it changed?

11:00

7

A. Sometimes change it three, four

11:00

8

times a day.

11:00

9

Q. And what has it varied from?

11:00

10

A. Zero, turning off the campaign,

11:00

11

suspending the campaign, to from -- to answer

11:00

12

your specific question, zero to I think it's

11:00

13

been as high as \$2,000 a day.

11:01

14

Q. And what causes you to change

11:01

15

your daily budget?

11:01

16

A. Our -- our web logs that track

11:01

17

traffic in correlation with the orders.

11:01

18

Certain times of day. Certain days of the

11:01

19

week. Certain keywords. Whether we're going

11:01

20

to continue in how the traffic is coming in

11:01

21

from -- from MSN or Yahoo in correlation with

11:01

22

our web logs and how that ties in. We've got

11:01

23

a formula that we look at.

11:01

24

Q. And because you advertise on MSN

11:01

25

and Yahoo also; is that correct?

1

B. Hanson

11:01

2

A. Yes, sir.

11:01

3

Q. And other than MSN, Yahoo and

11:01

4

Google, any other on-line advertising that

11:01

5

you've used on behalf of Industrial Printing

11:01

6

or CLRB Hanson?

11:01

7

A. Industrybrains.com. Super

11:01

8

Pages, Verizon Super Pages. Mama, M-A-M-A,

11:02

9

dot com. Request. That's a pay per

11:02

10

impression.

11:02

11

MR. BIDERMAN: Did you get the

11:02

12

name?

11:02

13

THE REPORTER: Yes.

11:02

14

A. That's what I can recall.

11:02

15

Q. Then I'll show you as exhibit

11:02

16

next in order, Exhibit 24, which are -- is

11:03

17

Exhibit A1 to the complaint or amended

11:03

18

complaint in this case.

11:03

19

(Discussion off the record.)

11:03

20

(Exhibit No. 24, Exhibit A1 to

11:03

21

the amended complaint in this case,

11:03

22

marked for identification as of this

11:03

23

date.)

11:04

24

Q. Exhibit 24 are, as I

11:04

25

represented, exhibits to the amended

C E R T I F I C A T E

STATE OF NEW YORK)

:SS

COUNTY OF NEW YORK)

I, AMY E. SIKORA, CRR, CSR, RPR, a
Certified Realtime Reporter, Certified
Shorthand Reporter, Registered Professional
Reporter and Notary Public within and for the
State of New York, do hereby certify that the
foregoing deposition of BRETT R. HANSON was
taken before me on the 18th day of August, 2006;

That the said witness was duly
sworn before the commencement of the testimony;
that the said testimony was taken
stenographically by me and then transcribed.

I further certify that I am not
related by blood or marriage to any of the
parties to this action nor interested directly
or indirectly in the matter in controversy; nor
am I in the employ of any of the counsel in
this action.

IN WITNESS WHEREOF, I have hereunto
set my hand this 29th day of August, 2006.



AMY E. SIKORA, CRR,